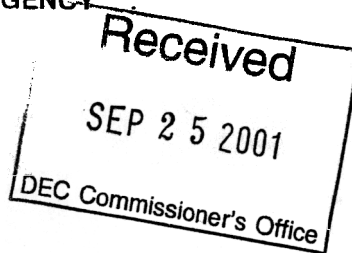




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

SEP 18 2001



Reply To
Attn Of: OAQ-107

Michele Brown, Commissioner
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 303
Juneau, AK 99801-1795

Dear Commissioner Brown:

The purpose of this letter is to obtain your commitment to get your agency's Clean Air Act Title V operating permits issued as expeditiously as possible. While EPA has asked each Title V permitting authority for a commitment to complete the Title V permits in the past, we now have a new reason to obtain a firm commitment from you.

On December 11, 2000, EPA published a *Federal Register* notice notifying the public of the opportunity to submit comments identifying any programmatic or implementation deficiencies in state Title V programs that had received interim or full approval. In that notice, EPA committed to respond to the merits of any such claims of deficiency on or before December 1, 2001. In response to that notice, two commenters identified overdue actions on Title V permits as deficiencies in the Alaska and Washington Title V permitting programs. As most of the states and locals in the country are overdue in their Title V permit issuance, it is reasonable to assume that if EPA determines that the Alaska and Washington state Title V programs are deficient, it will be necessary for EPA to write a Notice of Deficiency for the rest of the state and local programs where permits are long overdue.

In June of 2000, EPA requested each Title V permitting authority to submit a status update on initial Title V permit issuance. The request asked for the current status of permit issuance, the strategy for getting permits issued, and a projected issuance schedule. At that time, none of the 12 permitting authorities (PAs) in Region 10 had completed issuing all of their initial Title V permits. Today, we believe only three PAs have issued all of their initial Title V permits.

For those PAs that do not project to be completed with initial permit issuance by December 1, 2001, we are asking that a **revised schedule, with meaningful milestones, be submitted under your signature by October 1, 2001**. The milestones need to be specific and measurable. For example, a local program with 10 permits left to issue may be able to list specific permits that will be processed by a specific date. On the other hand, a state with over 100 permits left to issue may commit to processing a certain number of permits by specific dates. In any event, milestones must be set which clearly demonstrate sufficient progress toward meeting the revised completion date. Further, the revised completion date must be the soonest reasonable date to complete initial issuance and should be logically supported.

If you have any questions on this request, please contact Doug Hardesty, Manager of the Federal and Delegated Air Programs Unit, Office of Air Quality, at (206) 553-6641.

Sincerely,

Charles E. Findley
Acting Regional Administrator

To: Tom Chapple
Reply Direct
(For Comm) Gov Signature
Due Date: 10.15.01
MCS # 01.033
CTS #